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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERTO GONZALEZ,

Defendant.

CASE NO. 1:21-CR-00012

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for jury trial on July 9, 2024.
2. By this stipulation, the parties now move to vacate the jury trial date for a change of plea on July 29, 2024.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The parties have entered into and filed a plea agreement in this matter. For that reason, the parties agree that a date of July 29, 2024, is warranted for a change of plea. Prior to filing this stipulation, the parties conferred with the courtroom deputy for the assigned district court judge, who indicated this date is available for a change of plea.
 - b) The parties stipulate that the period of time until July 29, 2024, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv) because it

1 results from a continuance granted by the Court at defendants' request on the basis of the Court's
2 finding that the ends of justice served by taking such action outweigh the best interest of the
3 public and the defendant in a speedy trial.

4 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
5 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
6 must commence.

7 IT IS SO STIPULATED.

8
9 Dated: May 28, 2024

PHILLIP A. TALBERT
United States Attorney

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11 /s/ STEPHANIE M. STOKMAN
STEPHANIE M. STOKMAN
Assistant United States Attorney

12
13 Dated: May 28, 2024

/s/ MARK BROUGHTON

14 MARK BROUGHTON
15 Counsel for Defendant
ROBERTO GONZALEZ

16
17 **FINDINGS AND ORDER**

18 IT IS SO FOUND.

19 IT IS SO ORDERED.

20
21 Dated: **May 28, 2024**


UNITED STATES DISTRICT JUDGE